



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Randy Watson  
Commissioner  
Kansas State Department of Education  
900 SW Jackson Street  
Topeka, KS 66612

March 13, 2017

Dear Commissioner Watson:

Thank you for your participation in the U.S. Department of Education's (the Department) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB). The Every Student Succeeds Act (ESSA) maintains the essential requirements from NCLB that each State annually administer high-quality assessments in at least reading/language arts, mathematics, and science that meet nationally recognized professional and technical standards. Therefore, as you know, the Department reinstituted peer review of State assessment systems so that each State receives feedback from external experts on the assessments it is currently administering. We appreciate the efforts required to prepare for the peer review, which occurred in June and August 2016. State assessment systems provide essential information that States, districts, principals, and teachers can use to identify the academic needs of students, target resources and supports toward students who need them most, evaluate school and program effectiveness, and close achievement gaps among students. A high-quality assessment system also provides useful information to parents about their children's advancement against and achievement of grade-level standards. The Department's peer review of State assessment systems is designed to provide feedback to States to support the development and administration of high-quality assessments.

On October 6, 2016, the Department sent a letter to chief State school officers outlining the outcomes for States related to the assessment peer review. I am writing to provide you feedback on your State's recent submission of evidence. External peer reviewers and Department staff evaluated the Kansas State Department of Education's (KSDE) submission and found, based on the evidence received, that the components of your assessment system met some, but not all of the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA, as amended by NCLB. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- Reading/language arts (R/LA) and mathematics general assessments in grades 3-8. **Partially meets requirements.**
- R/LA and mathematics general assessments in high school. **Partially meets requirements.**
- R/LA and mathematics AA-AAAS in grades 3-8 and high school (DLM-Int). **Substantially meets requirements.**

400 MARYLAND AVE., SW, WASHINGTON, DC 20202  
<http://www.ed.gov/>

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

The component that **substantially meets requirements** meets most of the requirements of the statute and regulations but some additional information is required. The Department expects that KSDE should be able to provide this additional information within one year.

The components that **partially meet requirements** do not meet a number of the requirements of the statute and regulations and KSDE will need to provide substantial additional information to demonstrate it meets the requirements. The Department expects that KSDE may not be able to submit all of the required information within one year.

The specific list of items required for KSDE to submit is enclosed with this letter. Because some of the State's components have partially met the requirements, the Department is placing a condition on the State's Title I grant award related to those components of the assessment system. To satisfy this condition, KSDE must submit satisfactory evidence to address the items identified in the enclosed list. KSDE must submit a plan and timeline within 30 days outlining when it will submit all required additional documentation for peer review. The Department will also host regular (e.g., quarterly) progress calls with the State to discuss the State's progress on its timeline. If, following the peer review of the additional evidence, adequate progress is not made, the Department may take additional action. Additionally, the Office of Special Education and Rehabilitative Services (OSERS) will monitor progress on matters pertaining to requirements in the Individuals with Disabilities Education Act (IDEA) related to the participation of students with disabilities in Title I assessments. Insufficient progress to address such matters may lead OSERS to place a condition on KSDE's IDEA Part B grant award.

In addition, the full peer review notes from the review are enclosed. These recommendations to the Department formed the basis of the Department's determination. Please note that the peers' recommendations may differ from the Department's feedback; we encourage you to read the full peer notes for additional suggestions and recommendations for improving your assessment system beyond what is noted in the Department's feedback. Department staff will reach out to your assessment director in the next few days to discuss the peer notes and the Department's determination and to answer any questions you have.

The Department notes that KSDE requested and received approval on September 1, 2016, for a waiver from assessing speaking and listening standards for the 2016–2017, 2017–2018, and 2018–2019 school years.

Thank you for your ongoing commitment to improving educational outcomes for all students. I look forward to our continued partnership as we move ahead with this critical work. I appreciate the work you are doing to improve your schools and provide a high-quality education for your students. If you have any questions, please contact Jeanette Horner-Smith of my staff at: [OSS.Kansas@ed.gov](mailto:OSS.Kansas@ed.gov).

Sincerely,

/s/

Monique M. Chism Ph.D  
Acting Assistant Secretary  
Elementary and Secondary Education

Enclosures

cc: Beth Fultz, Assistant Director of Assessment

## Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Kansas's Assessment System

Critical Element	Additional Evidence Needed
<b>1.2 – Coherent and Rigorous Academic Content Standards</b>	<p>For the entire Kansas State Assessment system, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of broad stakeholder involvement in the development of the State's rigorous academic content standards.</li> </ul>
<b>2.1 – Test Design and Development</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• A description of the processes the State used to develop items for the Kansas content standards.</li> <li>• A plan and timeline to incorporate writing into the assessment system, OR, if this has already taken place, to submit additional evidence that the R/LA assessments are aligned to the full range of the State's content standards, including writing.</li> <li>• In addition to the information noted in the previous bullet, evidence that the tests assess the full range of the State content standards, including speaking and listening. (Note: KSDE has received a speaking and listening waiver; therefore, the Department does not expect Kansas to submit additional evidence regarding speaking and listening during the period of the waiver.)</li> <li>• Documentation of how item pool deficiencies described in Evidence #55 p. 8 were addressed, or a plan and timeline for addressing these deficiencies.</li> <li>• Evidence that the computer-adaptive item selection process supports the blueprints for the assessments.</li> </ul> <p>For the DLM IM AA-AAAS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• See evidence requested under elements 3.1 and 4.1 below.</li> </ul>
<b>2.3 – Test Administration</b>	<p>For the entire Kansas State Assessment system, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of established contingency plans to address possible technology challenges during test administrations.</li> </ul>
<b>2.5 – Test Security</b>	<p>For the entire Kansas State Assessment system, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence including an appropriate set of policies and procedures to prevent test irregularities, as well as to evaluate test irregularities that occur throughout the State's assessment system.</li> </ul>
<b>2.6 – Systems for Protecting Data Integrity and Privacy</b>	<p>For the entire Kansas State Assessment system, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of guidelines to protect student-level assessment data, privacy and confidentiality.</li> </ul>

Critical Element	Additional Evidence Needed
<b>3.1 – Overall Validity, including Validity Based on Content</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of an independent alignment study of KSDE general assessments that is technically sound and documents adequate alignment to the Kansas content standards.</li> <li>• Evidence of remediation of identified alignment deficiencies, if any.</li> </ul> <p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of analysis that supports the assumptions of testlet interchangeability across linkage levels used by the tests, including analysis of model fit.</li> <li>• Evidence that provides detailed descriptions of the routing pathways within and across essential elements (content domains).</li> </ul>
<b>3.2 – Validity Based on Cognitive Processes</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence indicating that its assessments tap the intended cognitive processes appropriate for each grade level as represented in the State’s academic content standards.</li> </ul>
<b>3.3 – Validity Based on Internal Structure</b>	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of consistency and accuracy of classifications resulting from the tests.</li> <li>• Evidence of item-level data (e.g., factor loadings or item-total correlations), or comparable node-level data that support the internal structure of the tests.</li> <li>• Evidence that reliability estimates are based upon known item and testlet parameters.</li> </ul>
<b>3.4 – Validity Based on Relationships with Other Variables</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of external validity of its general assessments.</li> </ul> <p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence that the assessment scores are related as expected with other variables.</li> </ul>
<b>4.1 – Reliability</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence that the assessments produce test forms with adequately precise estimates of a student’s achievement, including a description of the algorithm by which computer-adaptive panels, stages, and blocks are assembled.</li> </ul> <p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence regarding reliability estimation, which will be satisfied by response to element 3.3.</li> </ul>

Critical Element	Additional Evidence Needed
	<ul style="list-style-type: none"> <li>• Evidence regarding consistency and accuracy of classifications, which will be satisfied by response to element 3.3.</li> <li>• Evidence of model fit analysis, which will be satisfied by response to element 3.1.</li> </ul>
<b>4.4 – Scoring</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence that describes the contribution of multi-disciplinary performance tasks (MDPT) to assessment scoring.</li> </ul> <p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of scoring reliability statistics for writing items based upon test administrator ratings.</li> <li>• Evidence of a detailed description of the calibration used in scoring software (e.g., field test versus operational calibration).</li> <li>• Evidence that distinguishes between option level scoring and item level scoring.</li> </ul>
<b>4.5 – Multiple Assessment Forms</b>	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of analysis that supports the assumptions of testlet interchangeability, which will be satisfied by response to element 3.1.</li> </ul>
<b>4.6 – Multiple Versions of an Assessment</b>	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of analysis that supports the assumptions of testlet interchangeability, which will be satisfied by response to element 3.1.</li> </ul>
<b>5.1 – Procedures for including Students with Disabilities</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS and the For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence that the State provides a clear and comprehensive explanation of the differences between assessments in one or more formats (website or print material) that is accessible to all stakeholders.</li> <li>• Evidence that the State implements a process by which parents of students with the most significant cognitive disabilities are informed that their student's achievement will be based on alternate academic achievement standards and of any possible consequences of taking the alternate assessments.</li> </ul>
<b>5.3 – Accommodations</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Documentation of a process for individually reviewing and allowing exceptional requests for a small number of students who require accommodations beyond those routinely allowed.</li> </ul>
<b>5.4 – Monitoring Test Administration for Special Populations</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of a coherent monitoring program demonstrating that the State's processes for assuring appropriate test administration procedures</li> </ul>

Critical Element	Additional Evidence Needed
	are being implemented.
<b>6.2 – Achievement Standards-Setting</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence of a full achievement standards-setting report from the July 2015 standards-setting event.</li> </ul>
<b>6.3 – Challenging and Aligned Academic Achievement Standards</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Documentation of the alignment between the State academic content standards and the Performance Level Descriptors.</li> </ul>
<b>6.4 – Reporting</b>	<p>For the Kansas general assessments in R/LA and mathematics in grades 3-8 and HS, and for R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), KSDE must provide:</p> <ul style="list-style-type: none"> <li>• Evidence that score reports are available in alternate formats upon request.</li> <li>• Evidence of a State policy for reporting and delivering scores in a timely manner.</li> </ul>